



January 16, 2019

VIA ECF

Laura B. Dowgin

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Hon. Paul A. Engelmayer
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

**Re: Hiscox Insurance Company, Inc. v. Business Moves Consulting, et al.,
Case No. 18-cv-10222-PAE**

Dear Judge Engelmayer:

This firm represents Hiscox Insurance Company, Inc. ("Hiscox") in the above-referenced matter. Please accept this letter in response to the letter submitted by Curtis Bordenave dated January 14, 2019. Mr. Bordenave has had the benefit of two months to contemplate this lawsuit and determine whether to seek counsel in this matter, and has now asked the Court for another thirty days to appear.

Mr. Bordenave was served in this case on November 28, 2018 (Doc. No. 11) and previously requested an extension of time on December 12, 2018 (Doc. No. 12). On December 20, 2018, the Court granted this request and gave Mr. Bordenave until January 19, 2019 to file an answer or other responsive pleading (Doc. No. 13). There is no explanation in the January 14, 2019 letter as to why an additional thirty days are needed in order to appear.

Hiscox respectfully requests that, to the extent the Court is inclined to permit any such further extension of time, that it not grant the full thirty days requested. While this declaratory judgment action is pending, Hiscox continues to provide the Defendants with a defense in the underlying action pending before this Court (Case No. 1:18-cv-05187). Accordingly, Hiscox has an interest in moving this case forward quickly and is prejudiced by undue delay.

Sincerely,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Laura B. Dowgin", written in a cursive style.

By: Laura B. Dowgin

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Hon. Paul A. Engelmayer
January 16, 2019
Page 2

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cc: Mack Pampley, Business Moves Consulting, Inc. (via U.S. Mail)
Curtis Bordenave (via U.S. Mail)